

To whom it may concern,

I am writing to express my objection and opposition to Lightsquared's petition for a Declaratory Ruling that commercially available GPS receivers should not be legally protected against harmful interference from Lightsquared's (or any other) ATC operations.

As both a professional and recreational user of GPS for many years, I have come to appreciate what an essential part of America's (and the world's) infrastructure GPS has become. It has become integral to virtually any facet of living you care to think of – from emergency services to delivering the mail, from keeping aviation safe, to assisting utility companies in providing their services more efficiently and cheaply, from guiding the armed forces in their operations to helping skiers and hunters enjoy their recreation.

Virtually the whole world looks to GPS as an essential utility. Allowing a company such as Lightsquared to interfere with such an essential service (even if only on American soil) sends a very curious message to other nations about the importance and value which the US government places on maintaining and protecting its GPS service. It seems to say that, actually, the US government does not believe that GPS is of value and worth protecting. I find it hard to believe this is the case.

GPS has become such an integral part of so much of America's ordinary, day-today activity, I find it hard to believe that the FCC has allowed matters to progress this far. Billions of dollars have been invested in to GPS – not only by the US government, but also by the citizens of America, as individuals, as corporations and small companies, and by local government departments. Hundreds of millions of dollars have been spent by America's citizens on commercially available GPS receivers which give good service and work accurately and reliably in their present waveband. All those millions of GPS receivers currently in use could be rendered useless and obsolete should Lightsquared's current proposals be allowed to go ahead.

This is not due to "poor design" of existing receivers, it is due to those receivers being designed for the present operating environment, where the L-Band is kept "quiet" and reserved for low-level satellite to earth

transmissions. It is possible that receivers could be built today with better rejection of high-level out of band signals, and maybe that is something for the future, but the present, installed user base of receivers are not so designed. Some of these receivers could, possibly, be retro-fitted with filters (at whose expense?) but the majority of receivers could not be. So far as I know, there has been no truly independent testing to demonstrate the efficacy of any of the filter solutions proposed.

Lightsquared's claims that GPS would not be affected by their service have been refuted time after time by hard, independently gathered data. We know that Lightsquared's operations will have a severe adverse effect on the majority of GPS units currently in use, with possible consequences for the safety of human life, for commerce, and for the efficient delivery of services we now take for granted. It now seems as if, having been forced by the facts to accept that their signals would interfere with GPS, they now wish to have the rules re-written to say that such interference isn't their problem anyway, and that the rest of us will have to subsidise their activities by buying new GPS receivers. This does not seem right to me.

I therefore sincerely ask you to refuse to grant Lightsquared's petition for a Declaratory Ruling that commercially available GPS receivers should not be legally protected against harmful interference from Lightsquared's (or any other) activities

Sincerely,

Michael Mable

January 31st 2012